

Wherefore, the plaintiff demands judgment against the defendant for the full amount of damage caused him, including interest and costs of this action.

COUNT II

1. The plaintiff is Daniel Buynovskiy, an individual who resides at 569 Wilbraham Road, Springfield, Hampden County, Massachusetts.
2. The defendant is The Oppenheim Family Irrevocable Trust, a foreign corporation duly organized under law having its principal place of business at 24 5Th Avenue, New York, New York.
3. On or about April 27, 2017, the defendant was the owner and in control of a certain Rave Cinema located at 1190 Head of Pond Road, Southampton, Suffolk County, New York.
4. On said date, the plaintiff was operating his motor vehicle in front of 1190 Head of Pond Road, Southampton, Suffolk County, New York when a tree limb fell onto the plaintiff's motor vehicle.
5. The defendant, by its agents, servants or employees, negligently and carelessly maintained said tree.
6. As a result thereof, the plaintiff was seriously injured, suffered great pain of body and mind, was prevented from transacting his usual business and incurred expenses for medical care and attention.

Wherefore, the plaintiff demands judgment against the defendant for the full amount of damage caused him, including interest and costs of this action.

COUNT III

1. The plaintiff is Daniel Buynovskiy, an individual who resides at 569 Wilbraham Road, Springfield, Hampden County, Massachusetts.
2. The defendant is Thomas Gerbriale, an individual having a mailing address of P.O. Box 356, Bridgehamton, New York.
3. On or about April 27, 2017, the defendant was the owner and in control of a certain Rave Cinema located at 1190 Head of Pond Road, Southampton, Suffolk County, New York.

4. On said date, the plaintiff was operating his motor vehicle in front of 1190 Head of Pond Road, Southampton, Suffolk County, New York when a tree limb fell onto the plaintiff's motor vehicle.
5. The defendant, negligently and carelessly maintained said tree.
6. As a result thereof, the plaintiff was seriously injured, suffered great pain of body and mind, was prevented from transacting his usual business and incurred expenses for medical care and attention.

Wherefore, the plaintiff demands judgment against the defendant for the full amount of damage caused him, including interest and costs of this action.

THE PLAINTIFF

By _____/s/_____
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August 5, 2020